

SHERIFF'S ENTRY OF SERVICE FULTON COUNTY SHERIFF

Civil Action No. SUCV 202100269Superior Court ☒State Court ☐Juvenile Court ☐Date Filed 08/27/2021Georgia, BULLOCH COUNTY

TONYA THOMPSON

Heather Banks McNeal, Clerk
Bulloch County, Georgia

Attorney's Address

Edgar M. Smith, Esq.

MORGAN & MORGAN, 25 BULL ST., 4TH

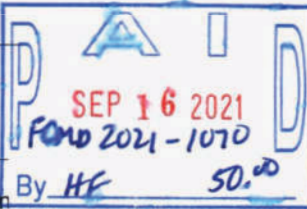
SAVANNAH, GA 31401

Name and Address of Party to Served

Statesboro Crossing Shopping Center, LLC

c/o reg agent, Registered Agent Solutions, Inc.

900 Old Roswell Lake Parkway, Suite 310 R



2nd ORIGINAL

HOBBY LOBBY STORES INC

STATESBORO CROSSING SHOPPING CE

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant _____ personally with a copy of the within action and summons.

☐NOTORIOUSI have this day served the defendant STATESBORO CROSSING Shopping CTR by leaving a copy of the action and summons at his most notorious place abode in this County.☐Delivered same into hands of LACEY GOWEN / INTAKE described as follows: age, about _____ years; weight _____ pounds; height _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

Served the defendant _____ a corporation

☐

by leaving a copy of the within action and summons with _____ In charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

☐

NON EST

Diligent search made and defendant _____

☐

not to be found in the jurisdiction of this Court.

This 20 day of sep, 2021

DEPUTY

PB 44



September 1, 2021



Fulton County Marshal's Dept.
Attn: Adriane Parker, Civil Process Division
160 Pryor Street
2nd Fl., Room J102
Atlanta, GA 30303

Re: TONYA THOMPSON vs HOBBY LOBBY STORES INC, and STATESBORO
CROSSING SHOPPING CENTER, LLC
Superior Court of Bulloch County
Civil Action No.: SUCV 202100269

Dear Sir/Madam:

Enclosed please find a copy of the above-styled lawsuit which is to be served upon:

STATESBORO CROSSING SHOPPING CENTER, LLC
c/o reg. agent, Registered Agent Solutions, Inc.,
900 Old Roswell Lake Parkway, Suite 310, Roswell, Georgia 30076

I have also enclosed a Sheriff's Entry of Service Form and our check in the amount of \$50.00, which represents your cost for serving this action. Please return a copy of the executed Entry of Service Form in the enclosed self-addressed, postage-paid envelope. If you have any questions, please do not hesitate to contact me at 912-443-1029 or vleal@forthepeople.com. Thank you in advance for your assistance in this matter.

Sincerely,

Vera D Leal
Litigation Paralegal to Edgar Smith
vleal@forthepeople.com
Direct: (912) 443-1025
Fax: (912) 443-1105

/vld
Enclosures

Batch # 87077457 seq # 7 Tracking #



UNITED STATES POSTAGE
PITNEY BOWES
02 1P
\$ 000.530
0000919226 SEP 09 2021
MAILED FROM ZIP CODE 31401

[MORGAN & MORGAN]
FOR THE PEOPLE.COM

ES/UDL

Morgan & Morgan
25 Bull Street, Suite 400
Savannah, GA 31401

3140132669 C031

11139170



Batch # 87077457 seq # 7 Tracking #

Print Form

SHERIFF'S ENTRY OF SERVICE GWINNETT COUNTY SHERIFF

Record ID

CLERK OF SUPERIOR COURT
BULLOCH COUNTY, GEORGIA
Magistrate Court
SUCV2021000269

OCT 07, 2021 08:42 AM

Civil Action No. SUCV2021000269Superior Court ☒State Court ☐Juvenile Court ☐Date Filed 08/27/2021Georgia, BULLOCHHeather Banks McNealHeather Banks McNeal, Clerk
Bulloch County, Georgia

Attorney's Address

EDGAR M. SMITH, Esq.

Plaintiff

MORGAN & MORGAN, 25 BULL ST., 4TH

VS.

SAVANNAH, GA 31401HOBBY LOBBY STORES, INC

Name and Address of Party to Served

STATESBORO CROSSING SHOPPING CEHobby Lobby Stores, Inc

Defendant

c/o Reg. Agt. CORPORATION SERVICE COMPANY2 Sun Court, STE 400, Peachtree Corners GLawrenceville, Gwinnett County, Georgia 30046

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant _____ personally with a copy
of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a
copy of the action and summons at his most notorious place abode in this County.

- ☐
- Delivered same into hands of _____ described as follows:
-
- age, about _____ years; weight _____ pounds; height _____ feet and _____ inches, domiciled at the residence of
-
- defendant.

CORPORATION

Served the defendant Hobby Lobby Stores, Inc a corporation

- ☒
- by leaving a copy of the within action and summons with
- Alisha Smith
-
- In charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises
designated in said affidavit and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an
☐ envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice
to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant _____

- ☐
- not to be found in the jurisdiction of this Court.

This 22 day of September, 2021

DEPUTY

M. E. Dyer 801763

**SUPERIOR COURT OF BULLOCH COUNTY
STATE OF GEORGIA**

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BULLOCH COUNTY, GEORGIA
SUCV2021000269

AUG 27, 2021 09:57 AM


Heather Banks McNeal, Clerk
Bulloch County, Georgia

CIVIL ACTION NUMBER SUCV2021000269

Thompson, Tonya

PLAINTIFF

VS.

Hobby Lobby Stores, Inc.
Statesboro Crossing Shopping Center, LLC

DEFENDANTS

SUMMONS

TO: HOBBY LOBBY STORES, INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Edgar Smith
MORGAN & MORGAN SAVANNAH
25 Bull Street
Savannah, Georgia 31401

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 27th day of August, 2021.

Clerk of Superior Court


Heather Banks McNeal, Clerk
Bulloch County, Georgia

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BULLOCH COUNTY, GEORGIA
SUCV2021000269

AUG 27, 2021 09:57 AM


Heather Banks McNeal, Clerk
Bulloch County, Georgia

IN THE SUPERIOR COURT OF BULLOCH COUNTY
STATE OF GEORGIA

TONYA THOMPSON,

Plaintiff,

v.

HOBBY LOBBY STORES, INC. and
STATESBORO CROSSING SHOPPING
CENTER, LLC

Defendants.

CIVIL ACTION NUMBER:

JURY TRIAL DEMANDED

COMPLAINT AND DEMAND FOR TRIAL BY JURY

COMES NOW, Plaintiff TONYA THOMPSON, and states her Complaint for Damages against Defendants HOBBY LOBBY STORES, INC. and STATESBORO CROSSING SHOPPING CENTER, LLC as follows:

PARTIES AND JURISDICTION

1.

Plaintiff Tonya Thompson is a citizen and resident of the State of Georgia.

2.

The incident that is the subject of this cause of action occurred at Defendant Hobby Lobby Stores, Inc.'s retail store located at 255 Henry Boulevard, Statesboro, Bulloch County, GA 30458.

3.

Defendant Hobby Lobby Stores, Inc. (hereinafter "Hobby Lobby") is a foreign corporation authorized to do business in the State of Georgia, with its principal office located in Oklahoma City, Oklahoma, and is subject to the jurisdiction of this Court. Defendant Hobby Lobby maintains offices and transacts business in Bulloch County, Georgia, the county in which this cause of action originated. Venue as to this Defendant is proper in Bulloch County, Georgia,

pursuant to O.C.G.A. § 14-2-510, as the tortious conduct alleged herein occurred in Bulloch County, Georgia. Defendant Hobby Lobby may be served by issuing Summons and a second original of this Complaint to its registered agent for service, Corporation Service Company, 2 Sun Court, Suite 400, Peachtree Corners, Georgia 30092.

4.

Defendant Statesboro Crossing Shopping Center, LLC (hereinafter “Statesboro Crossing”) is a foreign limited liability company authorized to do business in the State of Georgia, with its principal office located in New Orleans, Louisiana, and is subject to the jurisdiction of this Court. Defendant Statesboro Crossing maintains offices and transacts business in Bulloch County, Georgia, the county in which this cause of action originated. Venue as to this Defendant is proper in Bulloch County, Georgia, pursuant to O.C.G.A. § 14-2-510, as the tortious conduct alleged herein occurred in Bulloch County, Georgia. Defendant Statesboro Crossing may be served by issuing Summons and a second original of this Complaint to its registered agent for service, Registered Agent Solutions, Inc., 900 Old Roswell Lake Parkway, Suite 310, Roswell, Georgia 30076.

5.

Venue in the present case is proper in Bulloch County, Georgia.

FACTUAL ALLEGATIONS

6.

Plaintiff realleges and incorporates herein by reference Paragraphs 1 through 5 above as if they were restated verbatim.

7.

At all times material hereto, Defendant Statesboro Crossing owned and/or operated the property located at 255 Henry Boulevard, Statesboro, Bulloch County, GA 30458 (hereinafter

“the Premises”), and as such, possessed said property with the intent to occupy and control it and held it open to the public for business purposes.

8.

At all times material hereto, Defendant Statesboro Crossing owned and/or operated the property located at the Premises, and as such, possessed said property with the intent to occupy and control it and held it open to the public for business purposes.

9.

At all times material hereto, Defendant Hobby Lobby owned and/or operated the property located at the Premises, and as such, possessed said property with the intent to occupy and control it and held it open to the public for business purposes.

10.

On October 15, 2019, Defendant Hobby Lobby was in legal possession of the Premises located at 255 Henry Boulevard, Statesboro, Bulloch County, Georgia 30458.

11.

On or about October 15, 2019, Hobby Lobby was operating a retail store at the Premises.

12.

On or about October 15, 2019, Plaintiff entered the Premises for the purpose of shopping.

13.

On or about October 15, 2019, upon entering the Premises for the purpose of shopping therein, Plaintiff assumed the legal status of an invitee, as the term is defined under Georgia Law.

COUNT I

Negligence of Defendant Statesboro Crossing Shopping Center, LLC

14.

Plaintiff realleges and incorporates herein by reference Paragraphs 1 through 13 above as if they were restated verbatim.

15.

On or about October 15, 2019, Plaintiff was an invitee at the Premises.

16.

As Plaintiff walked into the Hobby Lobby store, approximately fifteen to twenty feet inside the store, she slipped and fell on a round metal object, resembling a small dowel.

17.

As a result of the aforementioned fall, Plaintiff suffered serious injuries.

18.

At all times relevant hereto, Statesboro Crossing owned and/or managed and/or operated the Premises and owed a legal duty of reasonable care to invitees to inspect and keep the Premises in a safe condition and to warn Plaintiff of hidden dangers or defects that were not discoverable in the exercise of reasonable care.

19.

At all times relevant hereto, Statesboro Crossing, by and through their employees, lessees, and/or agents, had actual and/or constructive knowledge of the hazardous condition of the unsafe and dangerous condition of the floor prior to Plaintiff's fall.

20.

At all times relevant hereto, Plaintiff had no knowledge of the unsafe and dangerous condition of the floor of the Premises, and it was not discoverable by Plaintiff in the exercise of

reasonable and ordinary care.

21.

At all times relevant hereto, Plaintiff exercised reasonable care for her own safety.

22.

At all times relevant hereto, Statesboro Crossing breached its duty of reasonable care in one or more of the following manners:

- a) Statesboro Crossing failed to inspect the Premises for dangerous conditions;
- b) Statesboro Crossing failed to warn patrons of a dangerous condition they knew or should have known existed at the Premises; and
- c) Statesboro Crossing failed to clean up said dangerous condition on the floor of the Premises when they knew or should have known said conditions existed.

23.

As a result of the foregoing, Statesboro Crossing breached its legal duty to Plaintiff, in violation of O.C.G.A § 51-3-1.

24.

As a direct and proximate result of the aforesaid breaches of duty and negligence by Statesboro Crossing, Plaintiff slipped on the debris, suffering personal injuries. Plaintiff has damages in excess of \$200,000 in past medical expenses and lost wages, in addition to past and future mental and physical pain and suffering, future medical expenses, and future lost wages.

25.

By reason of the foregoing, Plaintiff is entitled to recover compensatory damages from Defendant Statesboro Crossing Shopping Center, LLC in an amount to be proven at trial.

COUNT II

Negligence of Defendant Hobby Lobby Stores, Inc.

26.

Plaintiff realleges and incorporates herein by reference Paragraphs 1 through 25 above as if they were restated verbatim.

27.

On or about October 15, 2019, Plaintiff was an invitee at the Premises.

28.

As Plaintiff walked into the Hobby Lobby store, approximately fifteen to twenty feet inside the store, she slipped and fell on a round metal object, resembling a small dowel.

29.

As a result of the aforementioned fall, Plaintiff suffered serious injuries.

30.

At all times relevant hereto, Hobby Lobby owned and/or managed and/or operated the Premises and owed a legal duty of reasonable care to invitees to inspect and keep the Premises in a safe condition and to warn Plaintiff of hidden dangers or defects that were not discoverable in the exercise of reasonable care.

31.

At all times relevant hereto, Hobby Lobby, by and through their employees, had actual and/or constructive knowledge of the hazardous condition of the unsafe and dangerous condition of the floor prior to Plaintiff's fall.

32.

At all times relevant hereto, Plaintiff had no knowledge of the unsafe and dangerous condition of the floor of the Premises, and it was not discoverable by Plaintiff in the exercise of

reasonable and ordinary care.

33.

At all times relevant hereto, Plaintiff exercised reasonable care for her own safety.

34.

At all times relevant hereto, Hobby Lobby breached its duty of reasonable care in one or more of the following manners:

- a) Hobby Lobby failed to inspect the Premises for dangerous conditions;
- b) Hobby Lobby failed to warn patrons of a dangerous condition they knew or should have known existed at the Premises; and
- c) Hobby Lobby failed to clean up said dangerous condition on the floor of the Premises when they knew or should have known said conditions existed.

35.

As a result of the foregoing, Hobby Lobby breached its legal duty to Plaintiff, in violation of O.C.G.A § 51-3-1.

36.

As a direct and proximate result of the aforesaid breaches of duty and negligence by Hobby Lobby, Plaintiff slipped on the debris and fell, suffering personal injuries. Plaintiff has damages in excess of \$200,000 in past medical expenses and lost wages, in addition to past and future mental and physical pain and suffering, future medical expenses, and future lost wages.

37.

By reason of the foregoing, Plaintiff is entitled to recover compensatory damages from Defendant Hobby Lobby Stores, Inc. in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays and demands as follows:

1. That Process and Summons issue, as provided by law, requiring Defendant Statesboro Crossing Shopping Center, LLC to appear and answer Plaintiff's Complaint;
2. That Process and Summons issue, as provided by law, requiring Defendant Hobby Lobby Stores, Inc. to appear and answer Plaintiff's Complaint;
3. That service be had upon Defendant Statesboro Crossing Shopping Center, LLC, as provided by law;
4. That service be had upon Defendant Hobby Lobby Stores, Inc., as provided by law;
5. That the Court award and enter a judgment in favor of Plaintiff and against Defendant Statesboro Crossing Shopping Center, LLC for compensatory damages in an amount to be proven at trial;
6. That the Court award and enter a judgment in favor of Plaintiff and against Defendant Hobby Lobby Stores, Inc. for compensatory damages in an amount to be proven at trial;
7. That Plaintiff have a trial by a jury as to all issues; and
8. That Plaintiff have such other and further relief as the Court may deem just and proper.

This 27th day of August, 2021.

/s/ Edgar M. Smith
Edgar M. Smith
Georgia bar No. 683836
Attorney for Plaintiff

MORGAN & MORGAN
25 Bull Street, Suite 400
Savannah, Georgia 31401
T: (912) 244-5401
F: (912) 443-1125
edgarsmith@forthepeople.com

Thompson v. Hobby Lobby Stores, Inc., et al
Superior Court of Bulloch County
Complaint

**SUPERIOR COURT OF BULLOCH COUNTY
STATE OF GEORGIA**

FILED IN OFFICE
CLERK OF SUPERIOR COURT
BULLOCH COUNTY, GEORGIA
SUCV2021000269

AUG 27, 2021 09:57 AM


Heather Banks McNeal, Clerk
Bulloch County, Georgia

CIVIL ACTION NUMBER SUCV2021000269

Thompson, Tonya

PLAINTIFF

VS.

Hobby Lobby Stores, Inc.
Statesboro Crossing Shopping Center, LLC

DEFENDANTS

SUMMONS

TO: STATESBORO CROSSING SHOPPING CENTER, LLC

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Edgar Smith
MORGAN & MORGAN SAVANNAH
25 Bull Street
Savannah, Georgia 31401

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 27th day of August, 2021.

Clerk of Superior Court


Heather Banks McNeal, Clerk
Bulloch County, Georgia

20 Sep 21

PB 416

IN THE SUPERIOR COURT OF BULLOCH COUNTY
STATE OF GEORGIA

TONYA THOMPSON,)	
)	
Plaintiff,)	CIVIL ACTION NUMBER:
)	
v.)	_____
)	
HOBBY LOBBY STORES, INC. and)	
STATESBORO CROSSING SHOPPING)	
CENTER, LLC)	JURY TRIAL DEMANDED
)	
Defendants.)	

CERTIFICATE UNDER RULE 3.2

Pursuant to rules 3.2 and 3.4 of the Uniform Superior Court Rules, I hereby certify that no case has heretofore been filed in the Superior Court of Bulloch County involving substantially the same parties or substantially the same subject matter or substantially the same factual issues which would require the petition-pleading to be specifically assigned to the judge whom the original action was or is assigned.

This 27th day of August, 2021.

/s/ Edgar M. Smith
Edgar M. Smith
Georgia bar No. 683836
Attorney for Plaintiff

MORGAN & MORGAN
25 Bull Street, Suite 400
Savannah, Georgia 31401
T: (912) 244-5401
F: (912) 443-1125
edgarsmith@forthepeople.com

General Civil and Domestic Relations Case Filing Information Form☒ Superior or ☐ State Court of BULLOCH County**For Clerk Use Only**Date Filed MM-DD-YYYYCase Number **Plaintiff(s)**

THOMPSON, TONYA

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney EDGAR M. SMITH**Defendant(s)**

HOBBY LOBBY STORES, INC.

Last First Middle I. Suffix Prefix

STATESBORO CROSSING SHOPPING CENTER, LLC

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Bar Number 683836 Self-Represented ☐**Check One Case Type in One Box****General Civil Cases**

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contract
☐ Garnishment
☒ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Dissolution/Divorce/Separate Maintenance
☐ Family Violence Petition
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

Post-Judgment – Check One Case Type

- ☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Modification
☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case NumberCase Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

STATE OF GEORGIA

Secretary of State
Corporations Division
313 West Tower
2 Martin Luther King, Jr. Dr.
Atlanta, Georgia 30334-1530

ANNUAL REGISTRATION

Electronically Filed

Secretary of State

Filing Date: 3/3/2020 2:41:40 PM

BUSINESS INFORMATION

CONTROL NUMBER K941305
BUSINESS NAME HOBBY LOBBY STORES, INC.
BUSINESS TYPE Foreign Profit Corporation
EFFECTIVE DATE 03/03/2020
ANNUAL REGISTRATION PERIOD 2020

PRINCIPAL OFFICE ADDRESS

ADDRESS 7707 SW 44TH ST, OKLAHOMA CITY, OK, 73179-4808, USA

REGISTERED AGENT

NAME	ADDRESS	COUNTY
CORPORATION SERVICE COMPANY	40 TECHNOLOGY PARKWAY SOUTH, SUITE 300, NORCROSS, GA, 30092, USA	Gwinnett

OFFICERS INFORMATION

NAME	TITLE	ADDRESS
DAVID GREEN	CEO	7707 SW 44TH STREET, OKLAHOMA CITY, OK, 73179, USA
JON CARGILL	CFO	7707 SW 44TH ST, OKLAHOMA CITY, OK, 73179, USA
MART GREEN	SECRETARY	7707 SW 44TH STREET, OKLAHOMA CITY, OK, 73179, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE Peter M. Dobelbower
AUTHORIZER TITLE Officer

**STATEMENT OF CHANGE OF ADDRESS
OF REGISTERED OFFICE**

Electronically Filed
Secretary of State
Filing Date: 03/30/2021 16:29:57 PM

REGISTERED AGENT INFORMATION

NAME OF REGISTERED AGENT Corporation Service Company

ENTITY INFORMATION

Multiple entities are involved with this change of address.

NEW STREET ADDRESS AND COUNTY OF REGISTERED OFFICE

REGISTERED OFFICE ADDRESS 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA

REGISTERED OFFICE COUNTY Gwinnett

STATEMENTS

- The address of the entity's registered office and the business address of the registered agent, as changed, will be identical.
- **Statement of notification:** The undersigned certifies that written notice of the registered agent's change of address or a copy of this statement has been delivered or mailed to the above-named entity in accordance with the applicable provisions of the Official Code of Georgia Annotated.

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE Corporation Service Company by Janet Budhu, Asst. VP

AUTHORIZER TITLE Registered Agent

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 01/15/2021 11:45:58

BUSINESS INFORMATION

BUSINESS NAME : STATESBORO CROSSING SHOPPING CENTER LLC

CONTROL NUMBER : 18087254

BUSINESS TYPE : Foreign Limited Liability Company

JURISDICTION : Delaware

ANNUAL REGISTRATION PERIOD : 2021

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 5119 Magazine St., New Orleans, LA, 70115, USA

REGISTERED AGENT NAME : REGISTERED AGENT SOLUTIONS, INC.

REGISTERED OFFICE ADDRESS : 900 Old Roswell Lakes Prkwy.Suite 310, Roswell, GA, 30076, USA

REGISTERED OFFICE COUNTY : Fulton

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 5119 Magazine St, New Orleans, LA, 70115, USA

REGISTERED AGENT NAME : REGISTERED AGENT SOLUTIONS, INC.

REGISTERED OFFICE ADDRESS : 900 Old Roswell Lakes Prkwy.Suite 310, Roswell, GA, 30076, USA

REGISTERED OFFICE COUNTY : Fulton

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : James J Morrison

AUTHORIZER TITLE : Organizer

**IN THE SUPERIOR COURT OF BULLOCH COUNTY
STATE COURT OF GEORGIA**

TONYA THOMPSON,)	
)	
Plaintiff,)	
v.)	CIVIL ACTION
)	FILE NO. SUCV2021000269
HOBBY LOBBY STORES, INC. and)	
STATESBORO CROSSING SHOPPING)	
CENTER, LLC,)	
)	
Defendants.)	

**CONSENT MOTION TO DISMISS LESS THAN ALL
PARTIES WITHOUT PREJUDICE**

COME NOW, the parties, pursuant to O.C.G.A. §§ 9-11-21; 9-11-41, and jointly move this Court for an Order dismissing Plaintiff’s claims against Defendant Statesboro Crossing Shopping Center, LLC (hereinafter, “Statesboro Crossing”) without prejudice. The Parties hereto further show the Court as follows:

1.

The instant case arises out of a October 15, 2019, incident wherein Plaintiff Tonya Thompson (hereinafter, “Plaintiff”) alleges she was injured after slipping and falling “on a round metal object, resembling a small dowel” at a Hobby Lobby store located at 225 Henry Boulevard in Statesboro, Georgia (the “Premises”). Plaintiff alleges, *inter alia*, Defendant Statesboro Crossing negligently: (1) inspected the Premises for hazards; (2) failed to warn patrons of the purported hazard then existing at the Premises at the time of Plaintiff’s alleged fall; and (3) failed to clean up said hazard. (*See Pl.’s Compl., generally*).

2.

Plaintiff agrees to dismiss Defendant Statesboro Crossing from this case **WITHOUT PREJUDICE**.

3.

O.C.G.A. § 9-11-21 provides that “[p]arties may be dropped or added by order of the court on motion of any party or of its own initiative at any stage of the action and on such terms as are just.”

4.

Because less than all Defendants are being dismissed from this action, the dismissal of Defendant Statesboro Crossing from the instant action requires this Court’s approval.

5.

The dismissal of Defendant Statesboro Crossing from this action will not impact Plaintiff’s claims asserted against Defendant Hobby Lobby Stores, Inc.

WHEREFORE, the parties hereby respectfully move this Court to grant this Consent Motion for Dismissal of Less than All Parties Without Prejudice and enter the proposed Order Granting Dismissal of Less than All Parties Without Prejudice submitted herewith.

This 22nd day of October, 2021.

CONSENTED TO AND AGREED UPON BY:

/s/ Whitney L. Green

Whitney Lay Greene

Georgia Bar No. 955783

DREW ECKL & FARNHAM, LLP

(404) 885-1400

greenew@deflaw.com

Attorneys for Defendant Hobby Lobby Stores, Inc.

/s/ Edgar M. Smith (signed with express permission by Whitney L. Green, Esq.)

Edgar M. Smith

Georgia Bar No. 683836

MORGAN & MORGAN

(912) 244-5401

edgarsmith@forthepeople.com

Attorneys for Plaintiff

/s/ Zanita King-Hughes (signed with express permission by Whitney L. Green, Esq.)

Zanita King-Hughes

Georgia Bar No. 183240

LAW OFFICES OF T. TAMARA GAULDIN

(770) 730-3433

Zanita.King-Hughes@thehartford.com

Attorneys for Defendant Statesboro Crossing Shopping Center, LLC

**IN THE SUPERIOR COURT OF BULLOCH COUNTY
STATE COURT OF GEORGIA**

TONYA THOMPSON,

Plaintiff,

v.

HOBBY LOBBY STORES INC. and
STATESBORO CROSSING SHOPPING
CENTER LLC,

Defendants.

CIVIL ACTION
FILE NO. SUCV2021000269

CERTIFICATE OF SERVICE

This is to certify I have served a copy of the *CONSENT MOTION TO DISMISS LESS THAN ALL PARTIES WITHOUT PREJUDICE* upon all counsel of record through the Court's electronic filing system addressed as follows:

Zanita King-Hughes
Law Offices of T. Tamara Gauldin
1050 Crown Pointe Parkway, Suite 550-A
Atlanta, GA 30338
Zanita.King-Hughes@thehartford.com

*Attorneys for Statesboro Crossing Shopping
Center, LLC*

Edgar M. Smith
Morgan & Morgan
25 Bull Street, Suite 400
Savannah, GA 31401
edgarsmith@forthepeople.com

Attorneys for Plaintiff

This 22nd day of October, 2021.

DREW ECKL & FARNHAM, LLP

/s/Whitney Lay Greene

Whitney Lay Greene
Georgia Bar No. 955783
Attorneys for Defendant

303 Peachtree Street, NE
Suite 3500
Atlanta, Georgia 30308
(404) 885-1400
greenew@deflaw.com

**IN THE SUPERIOR COURT OF BULLOCH COUNTY
STATE COURT OF GEORGIA**

TONYA THOMPSON,)	
)	
Plaintiff,)	
v.)	CIVIL ACTION
)	FILE NO. SUCV2021000269
HOBBY LOBBY STORES, INC. and)	
STATESBORO CROSSING SHOPPING)	
CENTER, LLC,)	
)	
Defendants.)	

ORDER GRANTING DISMISSAL OF LESS THAN ALL PARTIES WITHOUT PREJUDICE

It appearing to the Court that the parties, having jointly moved to dismiss Defendant Statesboro Crossing Shopping Center, LLC (hereinafter, “Statesboro Crossing”) without prejudice and upon certain specified terms and conditions as set forth in the parties’ Consent Motion to Dismiss Less Than All Parties Without Prejudice (the “Consent Motion”), which is on file in this action; and, the Court having duly considered said Consent Motion;

IT IS HEREBY CONSIDERED, ORDERED, AND ADJUDGED that said Consent Motion to dismiss Defendant Statesboro Crossing from this action without prejudice is hereby granted and sustained, and Defendant Statesboro Crossing is hereby dismissed from this action without prejudice subject to the terms and conditions set forth in the written Consent Motion, which is incorporated herein by reference. The instant action and Plaintiff’s claims remain pending against Defendant Hobby Lobby Stores, Inc. The caption of this case shall be modified accordingly (i.e., *Tonya Thompson v. Hobby Lobby Stores, Inc.*).

SO ORDERED this ____ day of _____, 2021.

Honorable Judge Michael Muldrew
Bulloch County Superior Court

Jack Summer

From: Sandy Ratio
Sent: Friday, October 22, 2021 2:15 PM
To: Jack Summer
Subject: PeachCourt Activity Case # SUCV2021000269

From: PeachCourt Notifications <notifications@peachcourt.com>
Sent: Friday, October 22, 2021 2:00 PM
To: Whitney Lay Greene <GreeneW@deflaw.com>; Andrea Geddes <GeddesA@deflaw.com>; Sandy Ratio <RatioS@deflaw.com>
Subject: PeachCourt Activity Case # SUCV2021000269

The following filing was received by PeachCourt and has been successfully transmitted to the Clerk of Bulloch Superior Court. You will receive a separate confirmation message if this filing is accepted by the clerk. We invite you to reply to this message if you have any questions.

Submission Date: 10/22/2021 at 2:00 PM
Peach #: E-YEZZB2YA
Case #: SUCV2021000269
Case Name: THOMPSON v HOBBY LOBBY STORES, INC., et al

Documents

Motion: Consent Mot. to Dismiss Less Than All Parties Without Prejudice
Consent Motion to Dismiss Less Than All Parties without Prejuice.pdf

Proposed Order: Proposed Order on Consent Mot. to Dismiss Less Than All Parties Without Prejudice
Order on Consent Motion to Dismiss Less Than All Parties without Prejuice.pdf

Filer: Whitney Lay Greene Payment amount: \$31.35

eFiling Fee: \$30.00
Convenience Fee: \$1.35

Thank you for filing with PeachCourt, Georgia's eFiling and Document Access Solution.
If you have any questions about the status of this filing, please call the PeachCourt Support Center at 844-GA-EFILE (844-423-3453) and refer to Peach #E-YEZZB2YA.

PeachCourt is powered by a partnership between the Council of Superior Court Clerks of Georgia and GreenCourt Legal Technologies, LLC.

We are here to help! Reach out however you like:

Reply to this message
Call toll-free 844-GA-EFILE

Chat at <https://www.peachcourt.com/>
Learn a lot at <http://awesome.peachcourt.com/>